

1 - WILL GRANNIS -

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 ----- X
5 ULKU ROWE,

6 Plaintiff,

7 Case No.
8 19 Civ. 08655 (LGS) (GWG)

9 v.

10 GOOGLE LLC

11 Defendant.

12 ----- X

13 DATE: October 29, 2020

14 TIME: 11:33 A.M.

15 VIDEOTAPED VIDEOCONFERENCE DEPOSITION

16 OF WILL GRANNIS, held via Zoom, pursuant to

17 Notice, before Hope Menaker, a Shorthand Reporter

18 and Notary Public of the State of New York.

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2 Q. And in your interactions with her,
3 have you found her to be professional?

4 A. Yes.

5 Q. Have you found her to be
6 knowledgeable with respect to her subject area?

7 MR. GAGE: Objection.

8 A. As documented in performance reviews,
9 there are three categories. You know, when you
10 say "knowledgeable," that requires a view across
11 the three categories of the role. There's a
12 customer element of the role, there's an
13 engineering element of the role, and there's an
14 evangelism element of the role.

15 Ulku has demonstrated as -- you know,
16 as shown in her performance reviews she's
17 demonstrated acumen and knowledge; significant
18 knowledge in evangelism, knowledge of financial
19 services and customers, but impact knowledge on
20 the engineering pillar has been less than the
21 average in OCTO.

22 Q. And tell me what that means, "impact
23 knowledge."

24 A. What that means is the sec -- the --
25 if I may describe the three in a little more

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2 Q. -- or did the people you evaluated
3 fall within a certain category?

4 A. I'd have to look at the --

5 MR. GAGE: Objection.

6 A. I'd have to look at the data to give
7 you a definitive answer.

8 Q. Was a 5 a regular occurrence or would
9 that be more unusual for someone to be 4 to 5?

10 A. Statistically the least likely
11 ratings are the poles, as you would expect
12 the -- the extremes, the needs improvement, and
13 the superbs.

14 Q. Did Google apply any sort of Bell
15 Curve to -- or fourth-ranking process to its
16 evaluation rankings?

17 A. No, people were allowed to earn the
18 score that they earned.

19 Q. With respect to Ms. Rowe's
20 performance evaluation that you completed, were
21 you accurate or did you strive to be accurate in
22 terms of the feedback and assessment that you
23 provided in those reviews?

24 A. Yes, it's absolutely critical for the
25 functioning of the team; and as an example Ulku

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2 performed well in the one-to-one and one-to-many,
3 but did not perform well in engineering which is
4 why her rating was not higher.

5 Q. Did she do anything on that pillar?

6 MR. GAGE: Objection.

7 A. I'd have to --

8 MR. GAGE: In this particular year or
9 ever?

10 MS. GREENE: Ever.

11 A. Very little. Consistently if you
12 look over the span of her performance years,
13 you'll notice a very consistent pattern and that
14 is a lack of meaningful impact in engineering.

15 In her late -- latest performance
16 review which we just actually had this week it was
17 pointed out that she has started some efforts that
18 might be promising, but we don't grade on intent,
19 we grade on impact and Ulku has yet to demonstrate
20 any significant impact in the engineering pillar.

21 Q. And what -- you mentioned in this
22 year's review, what -- what review did you give in
23 this last have evaluation, what scores?

24 A. I think exceeds expectations. An
25 OCTO is limited in their ability to score high

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2 on -- on the rating if they're not fulfilling one
3 of the pillars on the job.

4 Q. Give me just a moment.

5 Okay. After Ms. Rowe joined Google,
6 did she raise concerns with you about her level?

7 A. The time when I remembered most
8 specifically was in the transition to the vertical
9 organization, when she was asking about the
10 correspondence that we -- that we talked about
11 earlier.

12 Q. Are you aware that in the fall of
13 2018, she raised with Kevin Lucas and Melissa
14 Lawrence concerns about her levelling and that men
15 had been leveled higher than her?

16 MR. GAGE: Objection.

17 A. I'm -- I'm not aware of the timing or
18 the nature of the concerns, but I am aware because
19 I had a discussion with employee relations that
20 there was a general concern.

21 Q. When was that discussion with
22 employee relations?

23 A. I don't remember off the top of my
24 head.

25 Q. Was it after she was back in OCTO or

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2 Q. Do you know whether the decision to
3 move her -- or I'm sorry.

4 Do you know whether the conversation
5 you had with Mr. Shaukat came after it was
6 communicated to her that she would not be getting
7 the -- the financial services lead role?

8 A. I -- I don't know the timing of that
9 commun -- I don't know the exact timing of the
10 communications, but I would assume she wouldn't be
11 looking for a role if she had a different role
12 that she wanted.

13 Q. Was this in early 2019?

14 A. Generally that sounds correct because
15 I think she's been in OCTO now a little over a
16 year, year and a half and that timeline would
17 match up because it didn't -- we didn't take too
18 long to bring her back.

19 Q. And once she moved back, what was the
20 discussion with respect to what her role would be
21 vis-à-vis financial services?

22 A. That it wouldn't be in financial
23 services and that was pretty clear. Tariq -- the
24 conversation he and I had about it was to focus on
25 technology, to focus on engineering, and to focus

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2 on an area that was important horizontally to the
3 platform and not to financial services, because
4 they were the -- Tariq's org was the organization
5 focused on financial services, hence the reason
6 for the reorg in the first place.

7 And I offered Ulku a choice of an
8 area to focus on and we determined that Hybrid
9 Cloud had enough investment potential behind it
10 from an engineering perspective and that her work
11 at a bank might line up well with knowledge of how
12 to implement hybrid architectures.

13 Q. Do you know who took over her -- what
14 she had been doing with respect to the financial
15 services industry?

16 A. In Tariq's organization?

17 Q. In Tariq's organization and just
18 generally in the organization?

19 A. Well, I can --

20 MR. GAGE: Objection.

21 A. I can only speak to OCTO directly.
22 When we made the reorg and moved the vertical
23 leaving OCTOs out of OCTO, we no longer focused on
24 and looked at financial services or manufacturing
25 as a primary designation for the team which is